

**Exhibit A**

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY  
PURSUANT TO 28 U.S.C. § 1746(2)**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

As representative of

THE COMMONWEALTH OF PUERTO  
RICO, *et al.*,

Debtors<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

Re: ECF No. 24050

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY  
PURSUANT TO 28 U.S.C. § 1746(2)**

I, Jonathan Miller, of legal age, 77, resident of 2447 Lost Valley Trail, Conyers, Georgia, 30094, under penalty of perjury declares the following:

1. My name and other circumstances are as stated above.
2. I am the Director of International Traffic Systems, LLC (“ITS”).
3. That in my position as Director of ITS I have personal knowledge of the amounts claimed in Proof of Claim No. 79073 filed on June 29, 2018 (the “Proof of Claim”), the facts which gave rise to the Proof of Claim, and the documents included thereof in support of the Proof of Claim.

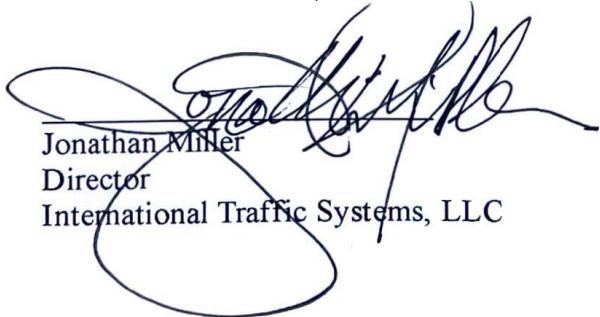
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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

4. I can attest that the information contained in the Proof of Claim, including the documentation attached thereto (and which is re-submitted as Attachments 2 – 5, 34 – 35, and 44 - 45 in this Declaration), are true and correct to the best of my knowledge, information, and belief, and are in accordance with ITS's business records.
5. That the invoices rendered by ITS under the Services Contract (the "Contract") entered between ITS and the Puerto Rico Highways and Transportation Authority ("HTA") on December 30, 2013 remain outstanding and that HTA has failed to pay these to ITS.
6. As required by the Contract, ITS prepared a fully operational System.
7. That I have read the *Response To the Five Hundred Seventieth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, the Puerto Rico Highways And Transportation Authority, And Puerto Rico Public Buildings Authority To Claims For Which Debtors Are Not Liable* (the "Response") and can confirm that the factual assertions raised in the Response are true and correct to the best of my knowledge, information, and belief, and are in accordance with ITS's business records.
8. I can attest that the additional documents referenced in the Response and included as Attachments 1, 6 – 33 and 36 - 43 in this Declaration are true and correct to the best of my knowledge, information, and belief, and are in accordance with ITS's business records.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 22, 2023.



Jonathan Miller  
Director  
International Traffic Systems, LLC